

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 3/10/2020 Brian Pete 77 Water Street, Suite 2100 New York, New York 10005 Peter.Shapiro@lewisbrisbois.com Direct: 212.232.1363

March 10, 2020

File No. 41462.02

VIA ECF

Hon. Lewis J. Liman, U.S.D.J. United States District Court Southern District of New York United States Courthouse 40 Foley Square New York, New York 10007 Pursuant to Paragraph 2(F) of the Court's Individual Practices, "[t]he proposed sealed document must be contemporaneously filed under seal in the ECF system and electronically related to the motion." The Court reserves judgment on this motion pending compliance with that directive.

3/10/2020

Re: Tanzanian Gold Corp. f/k/a Tanzanian Royalty Exploration Corp. v. Crede CG III, Ltd.,

Terren Peizer, and Michael S. Wachs Case No. 18-cv-4201 (LJL)(SN)

Dear Judge Liman:

Pursuant to this Court's Standing Order 19-mc-00583, and Your Honor's Individual Rules, Plaintiff Tanzanian Gold Corporation f/k/a Tanzanian Royalty Exploration Corporation ("TGC") respectfully submits this letter requesting that TGC be permitted to file the Affidavit of James A. Sinclair filed in support of TGC's Order to Show Cause for a Temporary Restraining Order and Preliminary Injunction under seal.

This request is made as Mr. Sinclair's affidavit contains confidential sensitive health information. Accordingly, it is respectfully requested that it be permitted to file the Affidavit of James A. Sinclair under seal to protect private and sensitive nature of the affidavit's contents.

Counsel for TGC has previously shared with Counsel for Defendants a physician letter substantiating Mr. Sinclair's condition and is prepared to produce the same to the Court.

Thank you for your attention to this matter.

Respectfully,

/s/Brian Pete

Brian Pete of LEWIS BRISBOIS BISGAARD & SMITH LLP